## **EXHIBIT 59**

## Kanav Kariya 8/18/2023

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UNITED STATES DISTRICT COURT
                                                                        APPEARANCES:
                                                                      2
                                                                        For Plaintiff:
 2
           SOUTHERN DISTRICT OF NEW YORK
                                                                            UNITED STATES SECURITIES AND EXCHANGE
                                                                            COMMISSION
    SECURITIES AND EXCHANGE
                                                                            BY: MS. DEVON STAREN
    COMMISSION,
                                                                              MR. JAMES CONNOR
 5
                                                                      5
                                                                            100 F Street NE
                                                                            Washington, DC 20549
           Plaintiff,
                                                                      6
                                                                           PH: 202.551.5346
 6
                       ) Case No.
                                                                            starend@sec.gov
                       ) 1:23-cv-1346 (JSR)
      VS.
                                                                      8
                                                                        For Defendant:
    TERRAFORM LABS PTE LTD. and
                                                                      9
                                                                           DENTONS US LLP
   DO HYEONG KWON,
                                                                            BY: MR. DOUGLAS W. HENKIN
                                                                     10
                                                                              MS. VIVIAN SANDOVAL
                                                                           1221 Avenue of the Americas
New York, NY 10020
            Defendants.
                                                                     11
                                                                           PH: 212.768.6700
10
                                                                     12
                                                                           douglas.henkin@dentons.com
11
                                                                     13
                                                                         For the Witness:
12
                                                                     14
13
                                                                            ZUCKER SPAEDER LLP
14
         VIDEOTAPED DEPOSITION OF KANAV KARIYA
                                                                     15
                                                                            BY: MR. R. MILES CLARK
15
               Chicago, Illinois
                                                                            1800 M Street NW Suite 1000
16
             Friday, August 18, 2023
                                                                            Washington, DC 20036
                                                                     16
                                                                           PH: 202.822.8106
17
                9:09 a.m. CST
                                                                            mclark@zuckerman.com
18
                                                                     18
19
                                                                        Also Present:
20
                                                                     19
21
                                                                            Certified Video Specialist Patrick McPherson
                                                                     20
22
                                                                     21
23
                                                                     22
   Reported by:
24
                                                                     23
    Diana G. Rodriguez, CSR
                                                                     24
   JOB No. 230818TCE
                                                                                                     3
                               1
 1
            UNITED STATES DISTRICT COURT
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                                                                                      WITNESSES
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           SOUTHERN DISTRICT OF NEW YORK
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                                                                         WITNESS:
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                                                                          KANAV KARIYA:
                                                                       4
 4
    SECURITIES AND EXCHANGE
                                                                           Examination by Ms. Staren
    COMMISSION,
                                                                       5
                                                                                                            131
                                                                           Examination by Mr. Henkin
 5
                                                                       6
            Plaintiff,
                                                                                      EXHIBITS
 6
                       ) Case No.
                                                                      8
                                                                              DESCRIPTION:
                                                                                                           PAGE:
                                                                         NO.:
                        ) 1:23-cv-1346 (JSR)
                                                                      9
                                                                         For Plaintiff:
                                                                     10
                                                                         Exhibit 1
    TERRAFORM LABS PTE LTD. and )
                                                                              Printout of Kanav Kirya LinkedIn
 8
    DO HYEONG KWON,
                                                                              page
                                                                     11
                                                                              For Identification
                                                                                                       13
                                                                     12
                                                                         Exhibit 2
 9
            Defendants.
                                                                              TFL-SEC 173218
                                                                     13
                                                                              For Identification
                                                                                                       19
10
                                                                         Exhibit 3
                                                                     14
11
                                                                              TFL-SEC 173215-216
12
                                                                                                       22
                                                                     15
                                                                              For Identification
13
                                                                     16
                                                                         Exhibit 4
14
           Videotaped deposition of KANAV KARIYA
                                                                              SEC-JUMPTRADE-E 59-66
    taken on behalf of the Plaintiff at 175 West Jackson
15
                                                                     17
                                                                              For Identification
16
    Boulevard, 14th Floor, Chicago, Illinois, beginning
                                                                     18
                                                                         Exhibit 5
                                                                              SEC-JUMPTRADE-E 1502
    at 9:09 a.m. and ending at 12:09 p.m., on Friday,
17
                                                                              For Identification
                                                                     19
18
    August 18, 20213, before Diana G. Rodriguez,
                                                                     20
                                                                         Exhibit 6
19
    Certified Shorthand Reporter No. 084-002945.
                                                                              SEC-JUMPTRADE-E 4325-4326
20
                                                                              For Identification
                                                                     2.1
                                                                                                       31
21
                                                                     22
                                                                         Exhibit 7
22
                                                                              SEC-JUMPTRADE-E 39-54
23
                                                                              For Identification
                                                                     2.3
24
                                                                     24
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MR. HENKIN: Object to form, foundation, answer the question at this time. 1 BY MS. STAREN: assumes facts not in evidence, paragraph 3 of the Q Did you tell Do Kwon that Jump would 3 3 protective order. agree to step up and help restore the peg by buying 4 MR. CLARK: Object to form. 5 5 up UST? BY THE WITNESS: 6 MR. HENKIN: Same objections. 6 On the instruction of counsel I exercise BY THE WITNESS: 7 7 my rights under the Fifth Amendment and decline to 8 A On the instruction of counsel I exercise 8 answer the question at this time. (Exhibits 17A and 17B marked for 9 my rights under the Fifth Amendment and decline to 9 answer the question at this time. 10 identification) 10 BY MS. STAREN: 11 MS. STAREN: So I'm going to hand you two 11 12 Did you tell Do Kwon that Jump would 12 documents. The first just represents the Bates 13 step in and help restore the peg if Do Kwon agreed 13 number of the video file that I will be playing that to amend the LUNA loan agreement and lift the is Exhibit 17A and -- the cover sheet represents 17A, which is the Bates number of the video file, vesting conditions? 15 15 16 MR. HENKIN: Same objections. 16 the screenshot is 17B. 17 BY THE WITNESS: 17 (Video played) 18 A On the instruction of counsel I exercise 18 BY MS. STAREN: my rights under the Fifth Amendment and decline to 19 Mr. Kariya, do you recognize the video 19 20 answer the question at this time. 20 that is Exhibit 17A that we just played? 21 BY MS. STAREN: 21 On the instruction of counsel I exercise 22 Q And when you asked Do Kwon to lift the my rights under the Fifth Amendment and decline to vesting conditions in exchange for Jump's agreement answer the question at this time. 23 23 to buy up UST to restore the peg, Do Kwon agreed to 24 Was that a video of you scrolling that, correct? 25 through your phone? 61 63 MR. HENKIN: Same objection and assumes facts MR. HENKIN: Object to form. not in evidence. BY THE WITNESS: 2 MR. CLARK: Object to form. 3 4 BY THE WITNESS: 5 A On the instruction of counsel I exercise answer the question at this time. 6 my rights under the Fifth Amendment and decline to BY MS. STAREN: 7 answer the question at this time. **Q** And what was being depicted on the 8 BY MS. STAREN: screen of your phone in that video? MR. CLARK: Object to form. 9 And you reached this agreement with Do 9

Kwon on the morning of May 23, 2021, correct?

MR. HENKIN: Object to form, foundation, assumes facts not in evidence and designation pursuant to paragraph 3 of the protective order.

14 MR. CLARK: Object to form.

15 BY THE WITNESS:

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16 On the instruction of counsel I exercise my rights under the Fifth Amendment and decline to 17 answer the question at this time. 18

19 BY MS STAREN:

Q Okay. I'm going to play a video for you 21 which is going to be marked as Exhibit 17A. And I can -- Mr. Kariya, you told Do Kwon that Jump would 23 step in and help restore UST's peg if Do Kwon agreed 24 to amend the LUNA loan agreement and lift the 25 vesting conditions, correct?

A On the instruction of counsel I exercise my rights under the Fifth Amendment and decline to

10 BY THE WITNESS:

11 On the instruction of counsel I exercise my rights under the Fifth Amendment and decline to 13

answer the question at this time.

14 BY MS. STAREN:

15 The screen of your phone was reflecting a series of communications between yourself and Do 17 Kwon, correct?

MR. HENKIN: Object to form, lack of

19 foundation.

18

25

20 BY THE WITNESS:

21 On the instruction of counsel I exercise 22 my rights under the Fifth Amendment and decline to answer the question at this time. 23

BY MS. STAREN: 24

Were these Signal communications?

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